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January 28, 2009

Honorable Katherine S. Hayden,  
United States District Judge  
United States Post Office and Courthouse  
Federal Square  
Newark, New Jersey 07102

Re: United States v. Samad Garrett  
Criminal No. 08-479

Dear Judge Hayden:

I represent Samad Garrett in connection with the above referenced matter. I respectfully request an extension of two weeks to submit any pre-trial motions on behalf of the defendant.

I have been on Trial in State v. Natasha White, before the Honorable Garry J. Furnari, J.S.C. since January 6, 2009, and the case is still proceeding. This is a murder case involving several civilian and law enforcement witnesses and it has been extremely time consuming. As you are aware, it was due to my involvement in this Trial that I had to send my Associate, Ilene J. McFarland, Esq., to cover the Arraignment for Mr. Garrett. It was at the Arraignment that Your Honor set the deadlines for the submission pre-trial motions.

I tried my best review the discovery with my client as expeditiously as possible to make an informed decision as to what, if any, pre-trial motions were applicable. The key piece of evidence against Mr. Garrett is an incident recorded on a CD. I made an appointment at the Hudson County Jail to view the CD, but unfortunately, the jail mistakenly provided a VCR rather than a CD player. I am now in the process of rescheduling that appointment, but I cannot make any final decisions on how to proceed in this case until I have had to opportunity to view this CD with my client.

Therefore, I respectfully request a two week adjournment to file any pre-trial motions. Thank you for your kind consideration of this matter.

Very truly yours,

MARTIN S. GOLDMAN

MSG/im

cc: John Romankow, Asst. United States Attorney

Request granted. New date to  
K.S. Hayden 2/3/09  
be embodied in an  
order to be prepared by AUSA Romanko.